

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**JESSICA JONES, et al.,**

Plaintiffs,

v.

**VARSITY BRANDS, LLC, et al.**

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**JURY DEMAND**

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**SUPPLEMENTAL DECLARATION OF JOSEPH R. SAVERI IN SUPPORT OF  
PLAINTIFFS' MOTION TO APPOINT CLASS COUNSEL**

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I, Joseph R. Saveri declare:

1. I am the Founder of the Joseph Saveri Law Firm, LLP ("JSLF") and am its Managing Partner. I am an attorney of record in this matter. I submit this Supplemental Declaration in support of Plaintiffs' Motion to Appoint Lead Class Counsel pursuant to Fed. R. Civ. P. 23(g). I have personal knowledge of the facts set forth in this Declaration. If called as a witness, I could and would testify competently to them.

2. My firm is one of the law firms representing Plaintiffs in the above-captioned matter.<sup>1</sup> I submit this declaration in support of Plaintiffs' Motion to Appoint the Joseph Saveri Law Firm, LLP as Lead Counsel and to Appoint Leadership Structure.

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<sup>1</sup> The other firms are Turner Feild, PLLC; Paul LLP; Hartley LLP; and Gustafson Gluek PLLC.

3. Defendants could have raised their arguments regarding named Plaintiffs' standing long before this opposition. The depositions of the two current named Plaintiffs concluded in February 2022.

4. To protect the valid claims of the proposed classes from Defendants' attack, on February 23, 2023, Plaintiffs have properly moved under Rule 23 to add a Plaintiff, a resident of Memphis, who among other things, indirectly purchased camps. *See* ECF No. 394. The addition of Ms. Coulson will protect proposed class members should Defendants continue their attacks against the current named plaintiffs. Defendants would not be prejudiced by this replacement. Plaintiffs have offered to make Ms. Coulson immediately available for deposition and provide expedited discovery.

5. Current named plaintiffs, Jessica Jones and Christina Lorenzen produced relevant documents, responded to interrogatories, and sat for deposition, and have fulfilled all duties to date in keeping apprised of the litigation. Both have testified to their ongoing commitment to serving the best interests of the proposed classes and fulfilling all duties as class representatives. They both submitted declarations in support of Plaintiffs' motion for class certification which detailed their commitment to serving the proposed classes.

6. Attached at **Exhibit 1** is a true and correct copy of a Fee Order, dated March 9, 2023, from *In re Capacitors Antitrust Litigation*, Case No. 3:17-md-02801-JD (N.D. Cal.).

7. Attached at **Exhibit 2** is a true and correct copy of excerpts from the Report of Randal Heeb, Ph.D., dated June 20, 2022, and excerpts from the Report of Janet S. Netz, Ph.D., dated June 20, 2022.

8. Attached at **Exhibit 3** is a true and correct copy of a letter from Steven Kaiser to Joseph Saveri dated February 2, 2023.

9. Attached at **Exhibit 4** is a true and correct copy of a letter from Joseph Saveri to

Steven Kaiser dated February 17, 2023.

10. Attached at **Exhibit 5** are true and correct copies of the Declarations of Jessica Jones and Christina Lorenzen, submitted in support of Plaintiffs' motion for class certification, ECF No. 387, both dated February 10, 2023.

11. Attached at **Exhibit 6** is a true and correct copy of an excerpt of the January 20, 2022 Deposition of Christina Lorenzen.

12. Attached at **Exhibit 7** is a true and correct copy of an excerpt of the February 10, 2022 Deposition of Jessica Jones.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 15, 2023 in San Francisco, California.

By: /s/ Joseph R. Saveri  
Joseph R. Saveri